

Louis M. Bubala III
Kaempfer Crowell
50 West Liberty Street, Suite 700
Reno, Nevada 89501
Tel: (775) 398-4741
Cell: (775) 223-7641
Fax: (775) 327-2011
Email: lbubala@kcnvlaw.com

Ronald P. Oines (CA State Bar No. 145016)
roines@rutan.com
Edson K. McClellan (CA State Bar No. 199541)
emcclellan@rutan.com
RUTAN & TUCKER, LLP
18575 Jamboree Road, 9th Floor
Irvine, California 92612
Telephone: 714-641-5100
Facsimile: 714-546-9035

Attorneys for Creditor
GEO-LOGIC ASSOCIATES, INC.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In Re:

METAL RECOVERY SOLUTIONS, INC.,
aka MRS, INC.,

Debtor(s)

Case No. 20-50660-gs
Chapter 7

**DECLARATION OF GARY LASS
IN SUPPORT OF GEO-LOGIC
ASSOCIATES, INC.'S REPLY
BRIEF IN SUPPORT OF ITS
MOTION TO COMPEL
COMPLIANCE WITH SALE
ORDER**

DECLARATION OF GARY LASS

I, Gary Lass, declare as follows:

1. I am the CEO of Geo-Logic Associates, Inc. ("GLA"), the Creditor in this bankruptcy action. I make this declaration in support of GLA's Reply to Opposition to GLA's Motion to Compel Compliance With Sale Order (the "Motion"). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. GLA has a variable rate line of credit to fund its operations when necessary. The current interest rate is 9%. GLA has borrowed on that line of credit when it otherwise would not have had to do so had the judgment against debtor Metal Recovery Associates, Inc. been paid. GLA currently carries a balance on that line of credit that it would not have to carry if the judgment were paid. At 9%, each month of delay in payment on GLA's judgment and proof of claim could cost GLA more than \$16,000.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 23, 2023, at Ontario, California.



Gary Lass

CERTIFICATE OF SERVICE

Pursuant to FRBP 7005 and FRCP 5(b), I certify that I am employee of KAEMPFER CROWELL, that I am over the age of 18 and not a party to the above-referenced case, and that on June 23, 2023 I filed and served the foregoing

DECLARATION OF GARY LASS IN SUPPORT OF GEO-LOGIC ASSOCIATES, INC.'S REPLY BRIEF IN SUPPORT OF ITS MOTION TO COMPEL COMPLIANCE WITH SALE ORDER as indicated below:

X **BY NOTICE OF ELECTRONIC FILING:** Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through Notice of Electronic Case Filing System, automatically generated by that Court's facilities.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 23, 2023

/s/ Louis M. Bubala III
An Employee of KAEMPFER
CROWELL